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VIA ECF

Hon. Judge J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Rivera, et al. v. 787 Coffee LLC, et al.
Case No. 1:22-cv-01596

Dear Judge Oetken:

This office represents Defendants in the above referenced matter. I, together with Plaintiffs' Counsel, submit this letter to request an extension of time to complete all fact discovery including completion of the parties' depositions by October 31, 2022; and file the parties' joint status letter one week after the close of all fact discovery on November 7, 2022. Due to the number of parties involved in the case, Counsel necessitated making such request to coordinate all of the parties' deposition schedules and complete discovery.

Pursuant to Your Honor's Individual Rules of Practice regarding extension requests, we state as follows:

(1) *Fact Discovery*: the original due date to complete all fact discovery including completion of the parties' depositions was September 8, 2022, and the deadline was extended to September 30, 2022 per the Court's July 26, 2022 Order. The new date requested is October 31, 2022;

Joint Status Report: the parties' joint status letter was due on or before September 15, 2022 and the extended deadline was October 7, 2022. The new date requested is November 7, 2022.

(2) this is the send request made to the Court to extend the time to complete all fact discovery and submit a joint status letter; and,

(3) this request is made on the consent of all parties herein.

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We appreciate the Court's time and attention in this matter.

Respectfully Submitted,

Seo Law Group, PLLC
By: /s/ Diana Seo
Diana Y. Seo, Esq.
Attorneys for Defendants

cc: All counsel of record (via ECF)